

RE: RM 11347

Mr. Glen Zook, K9STH, makes a case to further define the requirement very specifically for identification of Amateur Radio transmissions . I non-concur with his proposal to further define the current requirement for identification.

In my experience, amateur radio operators appear to “over-ID”. In some cases, it helps ensure effective communication flow. In other cases, it is simply wasted air time that could be better utilized. Pure lack of identification is not a common occurrence. Some amateurs interpret the scenario where an operator didn’t provide his/her call sign identification at the beginning of a conversation due to voice familiarity with the other party and is interpreted as not properly identifying.

The current wording in Part 97.119 is clear. “... No station may transmit unidentified communications or signals, or transmit as the station call sign, any call sign not authorized to the station.”

However, if we all take Mr. Zook’s interpretation to the extreme, one would have to identify every time he/she keys his/her microphone during an established communication with another station. I don’t believe that was ever the intent.

Earl says “This is N8KBR”

Joe says “Hi Earl” (Earl recognizes Joe’s voice)

Earl says “this is N8KBR, Hi Joe”

Joe says “How are you doing Earl”

Earl says “this is N8KBR, I’m doing okay, how are you?”

Joe says “I am doing fine. I got a phone call. I’ve got to go now, 73, <Joe finally states his call sign>

Earl says “this is N8KBR, Joe it has been good talking to you. 73, this is N8KBR

Consider this exchange took 30 seconds or maybe *nearly* 10 minutes. It doesn’t matter. Which is worse, the “over-ID” by N8KBR or Joe’s ID within 10 minutes and at the end of the communication? The “over-ID” by N8KBR was worse. Joe’s ID was sufficient “for the purpose of clearly making the source of the transmissions from the station known to those receiving the transmissions.” Okay, maybe we need a measure of patience.

I know I over exaggerated the case but I am making a point. The reasonable person can figure out how to operate in a manner that maintains the high operating standards we expect each other to meet.

Here is some insight and perspective provided from some other radio service rules:

47 CFR Part 95 - Subpart A_General Mobile Radio Service (GMRS) - Sec. 95.119
Station identification.

- (a) Except as provided in paragraph (e), every GMRS station must transmit a station identification: (1) Following the transmission of communications or a series of communications; and (2) Every 15 minutes during a long transmission.

47CFR Part 74 - Subpart H_Low Power Auxiliary Stations - Sec. 74.882 Station identification.

"(2) Station identification shall be performed in a manner conducive to prompt association of the signal source with the responsible licensee. In exercising the discretion provided by this rule, licensees are expected too act in a responsible manner to assure that result."

Here is an excerpt from the *The ARRL Letter, Vol 25, No 21 (May 26, 2006)*,_which helps provide some insight from the FCC:

<snip>

==>*RILEY HOLLINGSWORTH TO AMATEUR RADIO COMMUNITY: "LIGHTEN UP!"*

FCC Special Counsel for Enforcement Riley Hollingsworth advised those attending the FCC forum at Dayton Hamvention 2006 to try kindness instead of confrontation when problems arise on the bands. Hollingsworth spoke May 20 to a nearly full house at Hara Arena, and for the most part he praised the behavior of the majority of Amateur Radio operators, especially those who volunteered in the aftermath of Hurricane Katrina last year. But, he noted, radio amateurs still could be more courteous and less inclined to fly off the handle at some perceived on-the-air offense.

"You need to lighten up and not embarrass the Amateur Radio Service," Hollingsworth advised. "All of us make mistakes, especially with the new features you have on radios today. It's very easy to make a mistake, to be on the wrong frequency or be operating split and not know it--there's a hundred ways to make mistakes." Hollingsworth said experience has shown him that at least 75 percent of the interference complained about is absolutely unintentional.

In Hollingsworth's view, radio amateurs all too often are hypersensitive and rude. "We have a radar going to detect offenses at all times, we assume the worst in people, we rarely give people the benefit of the doubt," he said.

He joked that if there were three amateurs in a town, there would be two Amateur Radio clubs.

"And there'll be two hamfests with 20 people each, because they wouldn't dare consolidate them," he added.

Hollingsworth acknowledged that "certain problem operators" remain, but the real troublemakers are rarely the newcomers to Amateur Radio. "If there's a downfall in Amateur Radio, it won't be caused by no-code Technicians or codeless anything else," he said. "It'll be caused by the microphone--no doubt in my mind." He advised his audience to ignore the troublesome operators and not give them the attention they crave by engaging them on the air.

"Now, think about it: If what you're hearing annoys you, or angers you or is stupid, use the 'stupid filter,' which is that big knob--that VFO that will take you somewhere else," he quipped. "It's the largest knob on the radio." He recommended moving to another frequency or even another band altogether.
<snip>

Respectfully submitted,

Earl Paazig
Amateur Extra Class License, N8KBR